

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**INTERNATIONAL UNION,
UNITED AUTOMOBILE,
AEROSPACE AND
AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA - UAW**

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

CASE NO. 4:19-CV-00013-BYP

JUDGE BENITA Y. PEARSON

**UNOPPOSED MOTION TO STAY THE CASE, AMEND THE SCHEDULING ORDER
AND SET STATUS CONFERENCE**

Now comes plaintiff, International Union United Automobile, Aerospace and Agricultural Implement Workers of America – UAW (“Union”), by and through counsel, and moves this Honorable Court for an order staying this case, amending the scheduling order to strike the current discovery and dispositive motion deadlines, and setting a telephonic status conference with the Court in thirty (30) days. In support of this motion, the Union states the following:

1. The International Union’s offices are located at Solidarity House at 8000 E Jefferson Ave, Detroit, MI 48214. Solidarity House houses the offices of Union officers and personnel responsible for the Union’s relationships with its members and employers, and includes accounting, IT, legal and other Departments, including the UAW-GM Department.
2. On Saturday, July 13, 2019, a fire broke out at Solidarity House. The fire appears to have originated in the IT department. One floor of the building was damaged by the fire, and others were severely damaged by smoke and water. Union officials and the UAW Legal

Department do not have access to their offices or legal files. While the Union has access to some electronic records and email, that access is not complete and there is no access to paper records. Copies of news articles relating to the fire are attached.

3. Due to the fire and related damage, Union officials and counsel in the Union's Legal Department who are counsel in this case do not have access to records necessary to respond to discovery requests, to prepare for depositions, and to assist local counsel.

4. There is a telephonic status conference scheduled for July 19, 2019 at 12:00 p.m.

5. The current discovery cutoff in this case is August 5, 2019 and the dispositive motion deadline is September 9, 2019. The Union requests that these two deadlines be stricken, as it is unable to move forward with any discovery at this time.

6. The Union further requests that the Court stay the case for at least thirty (30) days until a further status conference with the Court.

7. The Union requests that the Court schedule a telephonic status conference in thirty (30) days to assess the status of matters and set new discovery and dispositive motion deadlines. The Union requests that at that time, the new dispositive motion deadline be set at least 30 days after the new date set for the conclusion of discovery.

8. Defendant General Motors, LLC does not oppose this motion.

Accordingly, the Union respectfully requests that the Court stay the case, amend the scheduling order to strike the discovery and dispositive motion deadlines, set a new dispositive motion deadline at least 30 days after the new deadline for the close of discovery, and set a telephonic status conference in thirty (30) days, or at the Court's convenience.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2019, I electronically filed the foregoing using the CM/ECF system. Notice of this filing will be sent to all parties or their representatives by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Joyce Goldstein

JOYCE GOLDSTEIN

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